

October 8, 2020

Joel Schneider, USMJ
United States District Court
District of New Jersey
1 John F. Gerry Plaza
Camden, NJ 08101

RE: Communication in response to ECF 197 from James Birchmeier

In Re: McBride v. Washington Township et al. 1:19-cv-17196

Dear Judge Schneider,

As the Plaintiff proceeding pro se, I write to the Court in response to Mr. Birchmeier's letter to request an additional status conference as to settlement with Defendant Washington Township. I would like to make the following points:

1. Defendant Washington Township is adamant that the case is dismissed without prejudice and therefore Defendant will not engage in discovery. Yet, they are demanding discovery as to my economic damages.
 - a. The loss of my job as a result of Defendant Washington Township is public record as are the "proofs" opposing counsel seeks (See *McBride v. Acadia Pharmaceuticals* 3:19-cv-01716). The amount is inclusive of base salary, employer contributions to social security, incentive compensation, cost of non-monetary benefits including but not limited to vehicle costs, health care, and retirement matching.
 - b. The legal fees incurred is plainly evident by looking at the Superior Court of New Jersey for *Donato v. McBride* GLO-L-340-17 and Township of Washington v. McBride GLO-DC-0002-18.
 - c. Plaintiff will absolutely not consider any monetary compensation below \$ 5 million until Defendant makes a serious offer worth considering. Zero, where Defendant is at presently, is not a serious.
2. Defendant's employee is on a social media binge using disturbing anti-Hispanic insults and epithets. No more than 30 minutes after I filed a "Hatch Act" complaint with the Defendant's Chief of Police, the disturbing social media presence, discoverable evidence was again deleted.
 - a. If opposing counsel can not get control of his client, then he deserves to be held accountable with an administrative investigation.
 - b. Outside counsel for Facebook, Inc. has agreed to preserve the evidence and will comply with a subpoena issued by this Court when the case is reactivated.

Very truly yours,

Brian McBride
Plaintiff Pro Se